

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO
ALBUQUERQUE DIVISION

GENERAL PROTECHT GROUP, INC., *et al.*,

Plaintiffs,

vs.

LEVITON MANUFACTURING CO., INC.,

Defendant.

Civ. No. 10-cv-01020-JB-LFG

**PLAINTIFFS' MOTION FOR FINDING OF
EXCEPTIONAL CASE UNDER 35 U.S.C. § 285 AND AWARD OF ATTORNEYS' FEES**

Pursuant to 35 U.S.C. § 285, Plaintiffs General Protecht Group, Inc., f/k/a Zhejiang Dongzheng Electrical Co., SecurElectric Corporation, G-Techt Global Corporation, and Warehouse-Lighting.com LLC (collectively "GPG"), along with Plaintiffs Harbor Freight Tools USA, Inc. and Central Purchasing, LLC (collectively "Harbor Freight") as the prevailing parties in this action, hereby move this Court for an order finding this case exceptional and awarding them their attorney fees and related expenses in the amount of \$1,047,155.95 for GPG, and in the amount of \$131,568.82 for Harbor Freight. In support of their motion, Plaintiffs rely upon the supporting memorandum of law, Declaration of Ann G. Fort and attached evidence, Declaration of William F. Long, Declaration of Rodger Michener, and Declaration of Mark J. Rosenberg and attached evidence filed along with their motion. If the Court concludes an evidentiary hearing is necessary, Plaintiffs respectfully request such a hearing before entry of any final order on this motion.

CONCLUSION

For the reasons set forth in their brief and supporting materials, Plaintiffs respectfully request that this Court enter an order setting an evidentiary hearing, if necessary; finding this case exceptional under 35 U.S.C. § 285; and awarding GPG its attorney fees and related expenses in the amount of \$1,047,155.95, and Harbor Freight its attorney fees and related expenses of \$131,568.82.

Dated: June 22, 2012

Respectfully submitted,

/s/ Roger E. Michener

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CERTIFICATE OF SERVICE

I certify that on June 22, 2012, I caused the foregoing document to be filed using the CM/ECF System in the United States District Court for District of New Mexico, which caused counsel of record for the parties to be served by electronic mail, as more fully reflected on the notice of electronic filing.

/s/ Roger E. Michener